

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

IN RE:	:	
STUDENT FINANCE CORPORATION,	:	Chapter 7
	:	
Debtor.	:	Bankruptcy Case No. 02-11620 (KJC)
	:	
CHARLES A. STANZIALE, JR., CHAPTER	:	
7 TRUSTEE OF STUDENT FINANCE	:	
CORPORATION,	:	Civil Action No. 04-1551 (JJF)
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
PEPPER HAMILTON LLP, et al.,	:	
	:	
Defendants.	:	

**MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT**

Plaintiff, Charles A. Stanziale, Jr., Chapter 7 Trustee of Student Finance Corporation (the "Trustee"), moves before this Court for leave to file a Second Amended Complaint in the form attached hereto as Exhibit A to re-assert a claim for aiding and abetting breach of a fiduciary duty against Defendants, Pepper Hamilton LLP and W. Roderick Gagné.<sup>1</sup>

The Trustee relies on the accompanying Brief and the Certification of Michael S. Waters in support of his Motion for leave to file a Second Amended Complaint.

May 4, 2007

THE BAYARD FIRM



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-and-

<sup>1</sup> A form of Second Amended Complaint, reflecting the differences in blackline, is attached hereto as Exhibit B.

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Chapter 7 Trustee*